

1 GUILLERMO MARRERO (Bar No. 099056)
2 JOSHUA J. RICHMAN (Bar No. 243147)
3 INTERNATIONAL PRACTICE GROUP
4 A Professional Corporation
5 1350 Columbia Street, Suite 500
6 San Diego, California 92101
7 Tel (619) 515-1480
8 Fax (619) 515-1481
9 gmarrero@ipglaw.com
10 jrichman@ipglaw.com

11 Attorneys for Plaintiffs

12 UNITED STATES DISTRICT COURT
13 SOUTHERN DISTRICT OF CALIFORNIA

14 SINDICATO DE EMPLEADOS Y
15 TRABAJADORES DE LA INDUSTRIA,
16 EL CAMPO Y EL COMERCIO DEL
17 ESTADO 29 C.R.O.M., a Mexican labor
18 union, and SINDICATO NUEVA
19 GENERACION DE TRABAJADORES
20 DE BAJA CALIFORNIA C.R.O.C., a
21 Mexican labor union;

22 Plaintiffs,

23 v.

24 CREDIT MANAGERS ASSOCIATION
25 OF CALIFORNIA, INC., dba CMA
26 BUSINESS CREDIT SERVICES, a
27 California non-profit corporation,

28 Defendant.

Case No. 07 CV 2365 J LSP

**SUPPLEMENTAL DECLARATION OF
MEXICAN ATTORNEY ROBERTO
QUIJANO**

I, Roberto Quijano, declare:

1. I am a Mexican attorney licensed to practice law in the United States of Mexico. I am a partner in the law firm Cervantes-Quijano in Tijuana, Mexico and have been practicing Mexican law for 25 years. I speak fluent English. I have personal knowledge of all facts stated in this declaration and if called to testify, I could and would testify competently and truthfully to them in a United States court of law.

1 2. On December 13, 2007, a petition was filed against Alissimo, S.A. de C.V.
2 ("Alissimo") and Resinas Laguna, S.A. de C.V. ("Resinas Laguna") by two Mexican labor unions
3 called SINDICATO DE EMPLEADOS Y TRABAJADORES DE LA INDUSTRIA, EL CAMPO
4 Y EL COMERCIO DEL ESTADO 29 C.R.O.M. ("ESTADO 29") and SINDICATO NUEVA
5 GENERACION DE TRABAJADORES DE BAJA CALIFORNIA C.R.O.C. ("NUEVA
6 GENERACION") before the Junta Local de Conciliacion y Arbitraje de Tijuana, the state labor
7 court of Baja California in Tijuana (the "Mexican Court"). ESTADO 29 and NUEVA
8 GENERACION are the Mexican labor unions that represent the interests of the employees of
9 Alissimo and Resinas Laguna respectively.

10 3. As a result of the filing of the above-described petition in the Mexican Court, the
11 employees' rights to the assets and income of Alissimo and Resinas Laguna have become
12 subrogated to the rights of the companies themselves. Also because of the filing, the employees
13 have obtained an immediate priority interest in all assets and income of Alissimo and Resinas
14 Laguna for the purpose of collecting unpaid wages and benefits, including but not limited to all
15 rights to the major liquid asset now in the possession of Defendant CMA in the United States.

16 I declare under penalty of perjury under the laws of the State of California that the
17 foregoing is true and correct.

18 Executed this 17th day of December, 2007 at Tijuana, Baja California, United States of Mexico.

19
20
21 
22 LIC. ROBERTO QUIJANO
23
24
25
26
27
28